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State of Oregon
Department of Environmental Quality Memorandum

To: Joe Mollusky, Port of Portland
Guy Tanz, Hahn and Associates

Date: August 24, 2000

From: Sheila Monroe

Subject: Work Plan for Supplemental Site Characterization
Port of Portland, Terminal 1
ECSI # 2642

DEQ has the following comments and recommendations on the August 10, 2000 "Draft Work Plan for supplemental site Characterization" prepared by Hahn and Associates, Inc for Terminal 1. As indicated in the work plan, this investigation only addresses potential upland issues. Our comments are limited to the review of information provided in the work plan and do not include any significant review of previous investigation information. It is possible that a thorough review of all site history and investigation information may result in identifying additional data gaps or contaminants of potential concern (COPCs) for the site.

Specific Comments

3.3.1 B-5 Area Please include storm drains and storm lines on figures. Have storm lines, particularly those associated with contamination such as B-5, been adequately investigated? Do storm lines in contaminated areas provide preferential conduits for contamination?

3.3.2 B-20 Area DEQ would not typically require additional investigation (or remediation) of total petroleum hydrocarbons (TPH) with this low of a concentration (36 parts per million (ppm)).

3.3.3 B-29 Area As above, DEQ may not typically require additional investigations of low TPH concentrations (67 ppm). We would generally consider the contaminant concentration relative to the suspected source.

3.34 B-37 Area Is any additional information regarding the dry well construction available, i.e. building permits, visual inspection, total depth, drain fields, etc., that should be considered prior to additional investigation? Please be advised that registration of dry wells is required by DEQ. More information is available at this web page: http://waterquality.deq.state.or.us/wq/groundwa/uichome.htm

Proposed soil samples will be collected from 5 and 16 feet below ground surface (bgs). Why were these depths chosen? How do these depths relate to the dry well's construction? Will the characterization plan allow for flexibility in sampling based on field observations?

3.3.5 B-38 Area Additional push probes may be installed based on field screening observations. More specifically, what observations will be considered? For example, visual and odor, stratigraphic changes, groundwater, etc. The discussion suggests that some soil samples will also be analyzed for volatile organic compounds (VOCs), polychlorinated biphenols (PCBs), and total metals. We recommend screening for these potential constituents in the most heavily contaminated samples. Table 2 more clearly presents our anticipated testing regime rather that Table 3 which appears to suggest that TPH-D and PAHs will be the primary (nearly exclusive) analytes.

3.4.1 Screening-level Groundwater Samples (Phase 1) Are PCBs a potential contaminant of concern in groundwater? Soil testing for PCBs appears to be fairly limited. If significant PCBs are subsequently detected during soil testing, consider screening groundwater samples for PCBs.

4.2.2 Reasonable Likely Future Beneficial Uses of Water In addition to the listed tasks, it may be useful to consider similar beneficial water use determinations in this vicinity such as Hoyt Street Railyard and Union Station.

General Comments

In addition to specific comments, DEQ recommends an additional push probe in the "former Slip No. 1" locale. Previous borings (B-8 and B-9) primarily assessed the fill material; the underlying native sediment has not been assessed. A push probe to the underlying native sediment should be used to investigate for residues from possible spills than may have occurred during the active operation of Slip No. 1. Tributyltin is an additional suspect contaminant that should be added to the list of potential contaminants for this locale.

Cc: Jennifer Sutter: NWR
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